

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

JANE DOE,

CASE NO: 1:25-cv-20757-JB/Torres

Plaintiff,

v.

STEVEN BONNELL II,

Defendant.

/

PLAINTIFF JANE DOE'S RULE 26(a)(1) INITIAL DISCLOSURES

Plaintiff Jane Doe, by and through her undersigned counsel, and pursuant to Federal Rule of Civil Procedure 26(a)(1) and Local Rule 26.1, hereby makes her Initial Disclosures, and states as follows:

Names of Individuals Likely to Have Discoverable Information:

- 1) Plaintiff Jane Doe: c/o Sanchez-Medina, Gonzalez, Quesada, Lage, Gomez & Machado, LLP ("SMGQLaw"). Plaintiff is likely to have discoverable information regarding the factual allegations of the Complaint, as well as Defendant's destruction of evidence.
- 2) Defendant Steven Bonnell II: Defendant is likely to have discoverable information regarding the factual allegations of the Complaint.
- 3) Hannah Brookes: c/o SMGQ Law. Hannah is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.
- 4) Melina Goransson: Melina is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.
- 5) Stasia (Screen name): Stasia is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.
- 6) Chaeiry (Screen name): Chaeiry is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.

- 7) Rose (Screen name): Rose is likely to have information regarding Defendant's nonconsensual dissemination of intimate images, including the Video of Jane Doe, and the publication of the videos on November 29, 2024.
- 8) Solotinyleaks (Screen name): Solotinyleaks is likely to have information regarding Defendant's nonconsensual dissemination of intimate images, including the Video of Jane Doe, and the publication of the videos on November 29, 2024.
- 9) Ashoka Bun-O (Screen name): Ashoka Bun-O is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.
- 10) Aurorastarr: (Screen name): Aurorastarr is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.
- 11) Abbymc (Screen name): Abbymc is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.
- 12) Dan Saltman: Dan is likely to have information regarding Defendant's nonconsensual dissemination of intimate images, including the Video of Jane Doe, and his destruction of evidence.
- 13) Kyla Turner: Kyla is likely to have information regarding the allegations of the Complaint including Defendant's nonconsensual dissemination of intimate images, including the Video of Jane Doe, and his interactions with the victims of the November 29, 2024 publications.
- 14) Denims (Screen name): Denims is likely to have information regarding Defendant's nonconsensual dissemination of intimate images and his destruction of evidence.

In this litigation, investigation and discovery are still ongoing. Said discovery and investigation may lead to the identification of additional individuals with information responsive to this required disclosure. Therefore, Plaintiff reserves the right to provide supplemental information as it becomes available. In listing the above witnesses, Plaintiff does not waive any right to assert the attorney-client privilege, work product protection or any other applicable protection or privilege.

Relevant Documents in Plaintiff's Possession:

1. Messages between Plaintiff and Defendant (some are only partial due to Defendant's recent deletions).
2. Links to the Videos published.

In this litigation, investigation and discovery are still ongoing. Said discovery and investigation may lead to the identification of additional individuals with information responsive to this required disclosure. Therefore, Plaintiff reserves the right to provide supplemental information as it becomes available. In listing the above witnesses, Plaintiff does not waive any right to assert the attorney-client privilege, work product protection or any other applicable protection or privilege.

Computation of Damages:

None at the moment.

In this litigation, investigation and discovery are still ongoing. Said discovery and investigation may lead to the identification of additional individuals with information responsive to this required disclosure. Therefore, Plaintiff reserves the right to provide supplemental information as it becomes available. In listing the above witnesses, Plaintiff does not waive any right to assert the attorney-client privilege, work product protection or any other applicable protection or privilege.

Insurance Agreements:

Not applicable.

Pursuant to Rule 26(a)(3), Plaintiff hereby announces that the individuals named in these Initial Disclosures may be called as witnesses in this case, and the documents referred to, as well as those obtained through discovery, may be introduced as evidence as well. Plaintiff reserves

her right to amend this witness and document list as needed based on information obtained during the discovery proceedings.

Date April 4, 2025.

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/s/ Carlos A. Garcia Perez
By: _____
CARLOS A. GARCIA PEREZ
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF filing system and copies were electronically sent to all counsel of records via the same.

/s/ Carlos A. Garcia Perez

By: _____
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